

*A(1) 440 (Rev. 8/01) Summons in a Civil Action

UNITED STATES DISTRICT COURT

District of

ANTHONY CAMPBELL

SUMMONS IN A CIVIL ACTION

v.

ISOLATIONS TECHNOLOGIES,
AND LARRY D'AMATO,
OPERATIONS MANAGER

CASE NUMBER:

04-40236 FDS

TO: (Name and address of Defendant)

ISOLATIONS TECHNOLOGIES
4 BUSINESS WAY
HOPEDALE, MA 01747

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

an answer to the complaint which is served on you with this summons, within _____ days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

TONY ANASTAS

CLERK

(By) DEPUTY CLERK

Sherry Jones

DATE

11-12-04

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Larry D'amato
Operations Manager
Isolations Technologies
4 Business Inlay
Hopedale, MA 01747

2. Article Number

(Transfer from service label)

7002 2410 0005 6659 7284

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Heather J. McNamee ☐ Agent ☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yesif YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service™

***CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

HOPEDALE, MA 01747

Postage \$ 0.60

Certified Fee 2.30

Return Receipt Fee (Endorsement Required) 1.75

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$ 4.65

UNIT ID: 0101

Postmark

Here

Clerk: FM5FX0

03/28/05

Sent To

Street, Apt. No.,

or PO Box No.

City, State, ZIP+4

Larry D'amato

4 Business Way

Hopedale, MA 01747

PS Form 3800, June 2002

See Reverse for Instructions

Weight: 1.10 oz.

Postage Type: PVI

Total Cost: 4.65

Base Rate: 0.60

SERVICES

Certified Mail 2.30

70022410000566597284

Rtn Recpt (Green Card) 1.75

Subtotal 4.65

Total 4.65

Cash 0.00

Change Due 0.00

Cash 4.65

Number of Items Sold: 1

UNITED STATES DISTRICT COURT

WORCESTER COUNTY, MASSACHUSETTS

ANTHONY CAMPBELL (PLAINTIFF)

vs

ISOLATIONS TECHNOLOGIES AND LARRY D'AMATO,
OPERATIONS MANAGER. (DEFENDANT)

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)
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EMPLOYMENT DISCRIMINATION

RE: **Anthony Campbell v. Isolations Technologies & Larry D'amato,
Operations Manager.**

PLAINTIFF'S Position Statement

1. PLAINTIFF POSITION:

I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel."

2. Isolations Technologies & Larry D'amato discriminated against me by failing to consider to hire me based on race/color (Black), in violation of M.G.L. c.151B §4(1) and Title VII of the 1964 Civil Rights Act. (b) A few moment later, Mr. D'amato approached me again and said, "I am the power who hires and fires, there will be no blacks ever to be hired by Isolations Technologies in the past, present, or future". I asked him if that's why there was not a single black employee at Isolations, and he said yes. I asked him if the owner, Micheal Rigolli, supported his view. Mr. D'amato stated that Micheal didn't have the power to hire and fire. He then stated that because he (Mr. D'amato) was Italian, he was the one with the power. After our conversation, I spoke with Steve (LNU) in the Quality Control. Steve informed me that Micheal Rigolli will be out of the

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office the next three days.

3. Isolations Technologies & Larry D'amato discriminated against me by failing to consider to hire me based on race/color (Black), in violation of M.G.L. c.151B §4(1) and Title VII of the 1964 Civil Rights Act." On April 2, 2002, I received a call from Paul, an employee at Excel Staffing, who informed me that I was no longer needed at Isolations Technologies according to Larry D'amato. While I had been working at Isolations, I saw many white individuals with little or no experience get hired. I believe I was more qualified for many positions into which these white individuals were hired.

I believe Isolations Technologies' failure to consider me for hire constitutes unlawful discrimination because of my race/color.

IN CONCLUSION AND BACKGROUND.

I was hired by Excel Staffing, as Machine Programmer/Machinist in September of 2001 -- understanding of G codes, M codes, editing programs, programming language (s), set-ups and understanding engineering drawings. I did work as a machinist. It is true I did work overtime. My rate was \$17.50 an hour.

TO THE CONTRARY OF ISOLATIONS TECHNOLOGIES STATEMENT & LARRY D'AMATO.

** I was never in anytime, form or manner ever offered the position to be hired by Isolations Technologies or by the Operations Manager and refused.

** I did not refused any employment with Isolations Technologies offered in anytime, form or manner. I did work overtime hoping to become Isolations Technologies employee but was neither offered nor hired. Because Mr. D'amato and Isolations had their minds made up not to hire a black person work-full for the company.

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**** Mr. D'amato stated that I were told of my termination prior to Paul informing me from Excel Staffing. If that was the case, then why I did not take my tools box with me prior to leaving the company premises on Friday of March 29, 2002. It is not true.**

I did not discuss anything with Steve (LNU) but rather asked about Micheal Rigolli and he said Micheal will be out the office the next three days.

I did report this case to The Commonwealth of Massachusetts Commission Against Discrimination, The Commonwealth of Massachusetts Labor Inspector Department, The Office Of the Attorney General Of the Commonwealth Of Massachusetts. I was told to filed this complaint with Massachusetts Commission Against Discrimination.

Larry D'amato, Operations Manager, also interfered with the exercise and enjoyment of my civil rights granted and protected by failing to consider me for hire based on race/color (Black), in violation of M.G.L. c.151B §4(4A).

Isolations Technologies and Larry D'amato, Operations Manager discriminated against me by failing to consider me for hire based on my color/race (Black), in violation of M.G.L. c. 151B §4(1) and Title VII Civil Rights Act.

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How could I refused employment with Isolations Technologies? When the job offered was not made. How could I refused pay cut when I was not hired. On what date and time, was the any documentation given me for employment, such as, Isolations Technologies Employment Application? Neither the application was given nor offered made.

Isolations Technologies and Larry D'amato, Operations Manager discriminated against me by failing to consider me for hire based on my race/color (Black), in violation of M.G.L. c.151B §4(1) and Title VII of the 1964 Civil Rights Act.

Larry D'amato, Operations Manager, also interfered with the exercise and enjoyment of my civil rights granted and protected by failing to consider me for hire based on race/color (Black), in violation of M.G.L. c151B §4(4A).

Respectfully submitted by:


Anthony Campbell
(PLAINTIFF)

P.O. BOX 3469

Worcester, MA 01613

TEL: (508)-757-5123